

EXHIBIT H

Investigative Report

Prepared by:

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London
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Reference:

QIS2020/STP/KAS/BT/001

Date

27th June 2020

Report Prepared for:

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1. Introduction

In March 2020 Quaestio Intelligence Services Ltd (“**Quaestio**”) was approached by a confidential source, known hereinafter as Source A1 (“**Source A1**”), with information that attempts were being made to source confidential information from Stokoe Partnership Solicitors (“**Stokoe**”), a long term client of Quaestio.

On receiving this information, Quaestio immediately informed the founding partner of Stokoe, Mr Haralambos Tsiattalou, who instructed Quaestio to speak to Source A1 and establish further details about the attempts to access Stokoe’s information, who the relevant individuals were, and what specific information was being targeted.

As a result of further discussions with Source A1, Quaestio has now established that the information being sought from Stokoe consists of its banking coordinates, certain bank transactional information, and information regarding Mr Tsiattalou’s travel to and from Dubai in February 2020.

In addition, following further investigations and discussions with Source A1, Quaestio understands that the following additional information has previously been sought from other individuals who have connections with Stokoe and litigation being conducted by one of its clients, Mr Karam Al Sadeq:

- (A) Background profile – Radhar Stirling
- (B) Current whereabouts – Radhar Stirling
- (C) Background profile – Maltin PR
- (D) Banking information and transactional history – Maltin PR
- (E) Background profile – Mr Tim Maltin
- (F) Records of call history – Mr Tim Maltin
- (G) Specific transactional history – Maltin PR’s transactions with Hogan Lovells International LLP, Stokoe, Mr Farhad Azima, Radhar Stirling
- (H) Banking information, transactional history – Hogan Lovells International LLP (specific account targeted)
- (I) Banking information, transactional history – Stokoe (various accounts)
- (J) Travel dates to and from Dubai – Mr Tsiattalou of Stokoe

During our discussions with Source A1 we were informed that the above requests were being passed to Source A1 by another individual whom we refer to in this report as Source A2. In turn, we were informed that Source A2 was receiving the requests from another individual, Mr Paul Robinson, with the requests ultimately originating from clients in the Middle East. We are informed that Source A1 believes Mr Robinson was himself receiving instructions from one or more other intermediaries in London and that Mr Robinson was forwarding information to the London agent(s) back to their ultimate clients in Dubai.

Having considered the information from Source A1 that had been obtained by Quaestio, Mr Tsiattalou instructed Quaestio to carry out its own investigations into the chain of instructions being issued and received, including the requests for information from Mr Robinson.

LIMITATIONS

Please note that, where appropriate, we have obtained intelligence through discreet human source (HUMINT) investigations where the individuals may be close to, or familiar with, the subject of enquiry and their interests. Therefore, this report describes the sources of the information but has anonymized certain sources to protect their identity. If, during the course of our enquiries, we identify potential witnesses whose identity can be disclosed, this will be reported on accordingly.

2. Executive Summary

1. According to our investigations, between July 2019 and April 2020 Mr Paul Robinson has requested various items of confidential information from different sources and has instructed Source A2 and, through him, Source A1 to obtain that information. The confidential information includes, among other things, requests for banking co-ordinates and specific transactional information from Stokoe. We are advised by Stokoe that it appears a number of the individuals and companies targeted by Mr Robinson are connected and are involved in current High Court litigation brought by one of Stokoe's clients, Mr Karim Al Sadeq.
2. It appears that the requests being made by Mr Robinson are for obviously confidential information. It also appears that Mr Robinson, Source A2 and Source A1 have used secure, anonymous, and encrypted methods of communication to pass on the requests for information and any information obtained in response to those requests. It is Quaestio's view that these methods appear to demonstrate that Mr Robinson and those instructing him are likely to be aware that they have no entitlement to access this information.
3. Quaestio has identified that, in addition to requests relating to Stokoe, a number of other targets have been identified by Mr Robinson including: Maltin PR, Mr Tim Maltin and, to lesser extent, Hogan Lovells International LLP, Mr Farhad Azima, and Radhar Stirling. In addition to this, we believe that attempts have been made, and may be on going, to enquire into Mr Tsiattalou's travel to and from Dubai.
4. Since Quaestio's involvement in this matter, we have been able to assist Stokoe in resisting the requests by Mr Robinson for confidential information (or, at least, those requests of which we have been made aware as a result of speaking with Source A1). It is not possible, however, to provide a complete assurance to Stokoe that no further or other attempts to access its confidential information have been made. Quaestio has also worked to resist any further intrusion into the confidential information of Mr Farhad Azima and Radhar Stirling.
5. The investigation so far has not confirmed to a reasonable degree of certainty the identities of the individuals other than Source A1, Source A2, and Mr Robinson who have received requests to access confidential information. In particular, whilst Source A1 has informed us of certain individuals who may be involved in these matters, we have not yet been able to obtain corroboration. Nor are we able, at this stage, to state with any reasonable degree of certainty the positive identity of the London agent(s) or Dubai clients mentioned by Source A1. Quaestio can state, however, that certain incidents of surveillance notified to us separately by Mr Tsiattalou are not inconsistent with Source A1's account.
6. In particular, Quaestio believes that Mr Stuart Page has admitted in recent legal proceedings that he has previously been retained as a private security and corporate investigator on behalf of the Government of Ras Al Kamiah. We understand from Mr Tsiattalou that Mr Page was identified by Stokoe's legal team during one of a number of recent trips to Dubai during which surveillance operatives were apparently observed. We are also informed that Mr Tsiattalou believes that his hotel room may have been accessed on one of those trips.

3. Investigation & Findings

Data Assessment

Quaestio's initial approach to this investigation was to obtain an account of relevant events from Source A1 and to assess which communications Source A1 had been involved in. Quaestio has prepared a timeline setting a chronological order of the events of which we are aware, including information provided to us by Source A1 and document(s) we have been shown. The chronology reveals the lines of communication and the nature of the instructions being received and relayed by Mr Robinson.

The key events relating to our Source A1 are set out below, which includes events we believe have occurred prior to Quaestio's involvement in March 2020. Source A1 has indicated that Source A2 has been involved in these events, although we are informed that Source A2 is currently unaware of Source A1's approach to Quaestio. Source A1 has informed us that he is not willing to divulge this Source A2's identity.

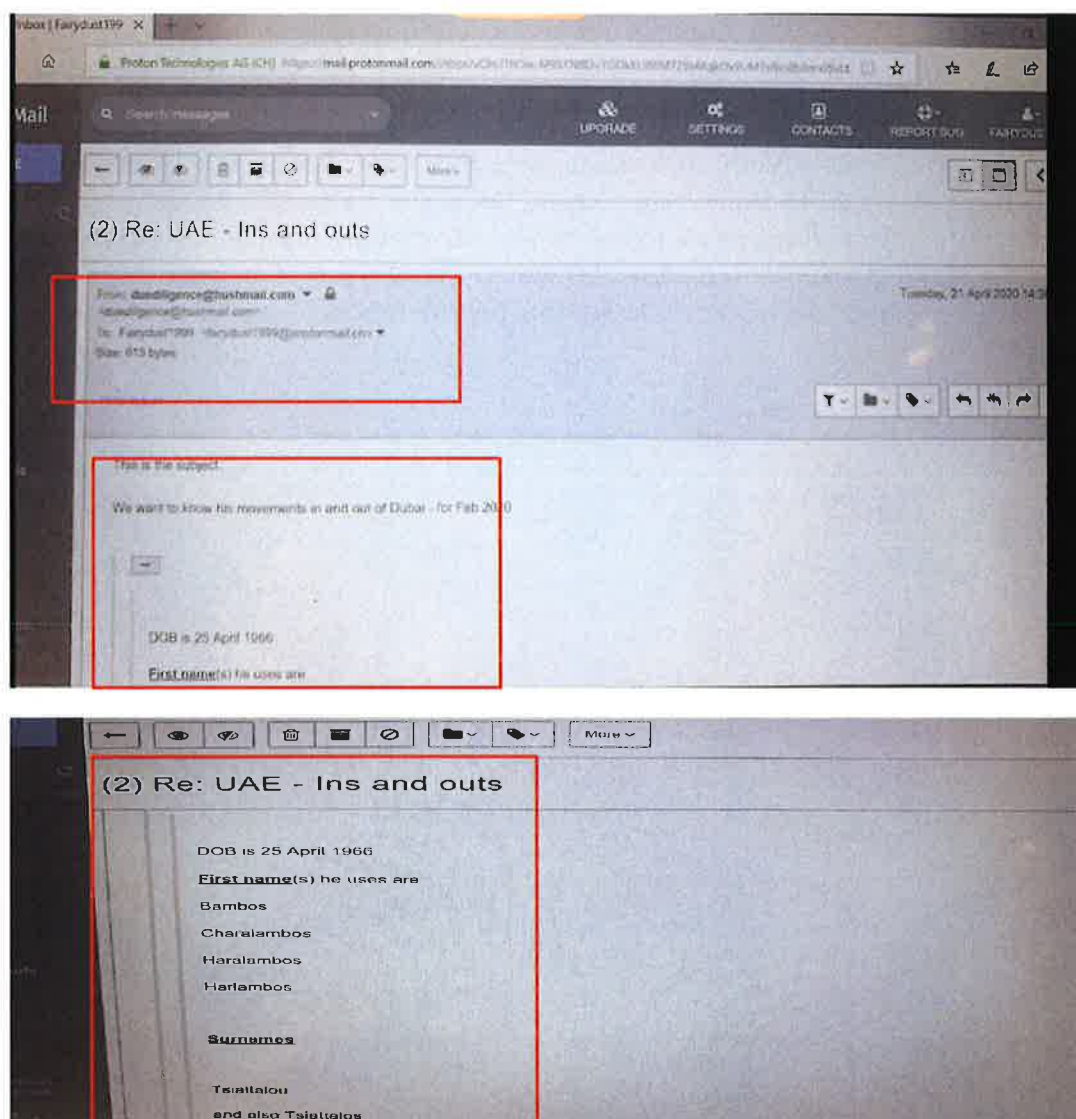
Date	Time	Notes
Jul - Oct		A1 to A2 via phone call / Threema Identify Radhar Stirling - mobile - address and/or whereabouts / banking
Dec		A1 to A2 re mobile for Radhar Stirling and obtain month of calls/texts - could not identify subscriber
13-Feb		Excel spreadsheet created for Maltin PR banking
17-Feb		Access Maltin PR Ltd - mobile of Tim Maltin - Password Protected
08-Mar		A2 instructs A1 via Threema messaging platform asking A1 to open up payments on Radhar Stirling & F Azima
11-Mar		A2 instructs A1 via Threema messaging platform to 'open up' credits on Maltin PR Bank statement dated 2nd December 2019 for £37,695.00 & 20th December £18000.00 re 'HLI')
02-Apr		A2 instructs A1 via Threema messaging platform - Open up Stokoe Partnership re Maltin results
03-Apr		A2 sent email to duedilligence@husmail.com with Maltin PR further banking info for Feb & March 2020
06-Apr		A2 asks A1 via Threema to investigate HLI and pull three months corporate banking
08-Apr		A2 emails duedilligence@husmail.com with the Stokoe Partnership Manch Account statement
09-Apr	07:56	A2 asked A1 via Threema platform to proceed with the Stokoe Partnership to further ID main trading account x 3 months
14-Apr	14:41	A2 advises A1 via Threema platform that A2 may be able to meet his client in next few days re payment
14-Apr		Telephone call A1 to A2 via Threema and establishes A2 is due to meet with client (duedilligence@husmail.com) in Waitrose Petersfield
15-Apr	10:46	A2 emails duedilligence@husmail.com main Stokoe Bank Account
17-Apr		A2 to email duedilligence@husmail.com further report on Stokoe main account containing 1st April transactions
20-Apr		duedilligence@husmail.com emails A2 to look at x2 landline telephone numbers 0203 936 5703 / 0203 9367073
20-Apr		A2 meets with duedilligence@husmail.com in Southampton re cash drop circa 1700 - 1800
21-Apr	14:30	duedilligence@husmail.com emails and instructs A2 to identify the ins and outs of Feb 2020 re Dubai BT
22-Apr		A2 to A1 via Threema to ID client account and initially provide one month for March 2020 with a view for doing November to Feb
23-Apr		A1 provides A2 HLI negative report with incorrect banking and other information
23-Apr	11:56	A2 calls via Threema A1 re Stokoe re 'SFB' payment asking if anything had been amended re statement - A1 explains that narrative is put down by the user

During our investigation, we have been able to review a number of email communications¹ and Threema² message threads (private messaging platform). These documents demonstrate requests being made by Mr Robinson and the return of information to Mr Robinson.

Where email and private messaging has been mentioned in this report, Source A1 has provided copies of this to Quaestio. Source A1 has informed us that he had been given access to an email account: fairydust1998@protonmail.ch. In these exchanges we can see information being sent by and received by Source A2 and in turn being sent and received by Mr Paul Robinson. All Threema messages that were provided by Source A1 were given to Quaestio with Source A1's consent for reference purposes only.

It was established by Source A1 that Mr Robinson was using the email account: duediligence@hushmail.com.

Example of Email Instruction from email account operated by Paul Robinson



¹ Annex 1 – Emails between Paul Robinson & Source A2

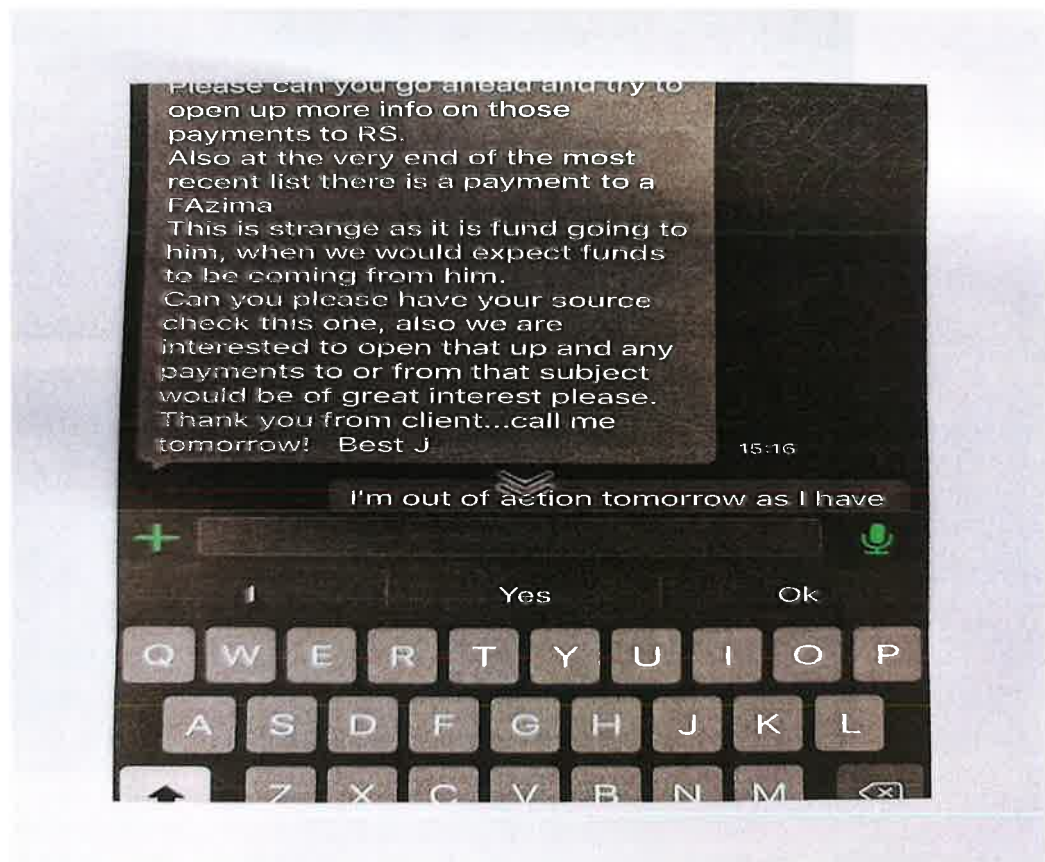
² Annex 2 – Threema Private Messages between Source A1 & Source A2

Data Assessment Summary - Pre Quaestio

Prior to Source A1 approaching Quaestio, it can be seen from the material available that those instructing Mr Robinson were keen to obtain information about Radhar Stirling. According to Source A1, no useful information on her whereabouts, telephone numbers and banking information was reported back to Mr Robinson. We note however that these requests were being made as far back as July 2019 and the reader will need to consider what relevance this date may have. We have no way of telling whether Mr Robinson has made any further attempts to obtain the same or related information about Ms Stirling from other sources.

In February 2020, Mr Robinson requested two categories of information in relation to Maltin PR and Mr Tim Maltin. In the instance of Maltin PR, Mr Robinson requested confidential financial records in the form of periods of transactional history from the company's bank account. According to Source A1 and the material available to us monthly transactional data was in fact delivered to Mr Robinson for onward transmission to his clients. Mr Tim Maltin's phone records were also requested, although Quaestio understands that these were not available and that Mr Robinson was informed about this. Quaestio has no way of telling whether Mr Robinson has made any further attempts to obtain this information through other sources.

On 8 March 2020 requests were made by Mr Robinson for specific transactional data relating to the Maltin PR bank account. The specific transactions related to payments in relation to Radhar Stirling and Mr Farhad Azima. Mr Robinson asked for the banking coordinates for these two subjects. An exchange between A1 and A2 is seen below where Quaestio is aware that the narrative in this request has been copied from Mr Robinson's message and relayed down the line.



As will be mentioned later in this report, no information was delivered back to Mr Robinson in relation to these specific requests. Source A1 was now providing cooperation to Quaestio and steps were taken to control the information provided in response to these requests.

On 11 March 2020, Mr Robinson sent a further instruction requesting that the Maltin PR bank account be accessed in relation to transactions pertaining to Hogan Lovells and that he required the banking co-ordinates for this firm of solicitors. As will be mentioned later in this report no information was delivered back to Mr Robinson in relation to these specific requests.

In short, it appears that the requests by Mr Robinson were being made on behalf of other persons. According to Source A1, the ultimate clients of Mr Robinson were believed to be in Dubai. It is Quaestio's view that the information requested was obviously confidential and was being requested in a manner which suggests Mr Robinson, and those for whom he acts, were likely aware that they had no entitlement to this information.

Stokoe Legal Team in Dubai – Hotel Break-in & Surveillance

In the course of this investigation, Quaestio has been provided with an account from Mr Tsiattalou as to certain suspected surveillance activities during recent trips he has made to Dubai. We understand that, having been instructed by Mr Karim Al Sadeq in mid-October 2019, Mr Tsiattalou and his legal team made various trips to Dubai throughout January, February and March 2020 in connection with Mr Al Sadeq's case. During those trips, the members of the legal team stayed at the 'One and Only' hotel on the Palm.

On 19 February 2020 Mr Tsiattalou returned to his hotel room to find the balcony door left open. Mr Tsiattalou reported the matter to the hotel and requested sight of the hotel's CCTV as he believed that his room had been accessed without permission. Quaestio understands that the hotel was resistant to these requests and suggested that it was in fact the cleaner who had left the balcony door open. We understand that Mr Tsiattalou did not accept this explanation as the cleaner had denied leaving the balcony door open. We are informed that Mr Tsiattalou complained to the general manager at the time and that further letters of complaint have since been sent.

We are also informed that, upon further investigations by Mr Tsiattalou and members of his team, a member of the hotel staff told them that Dubai security services were monitoring Mr Tsiattalou and the Stokoe legal team and had been doing so throughout the times they had stayed at the hotel.

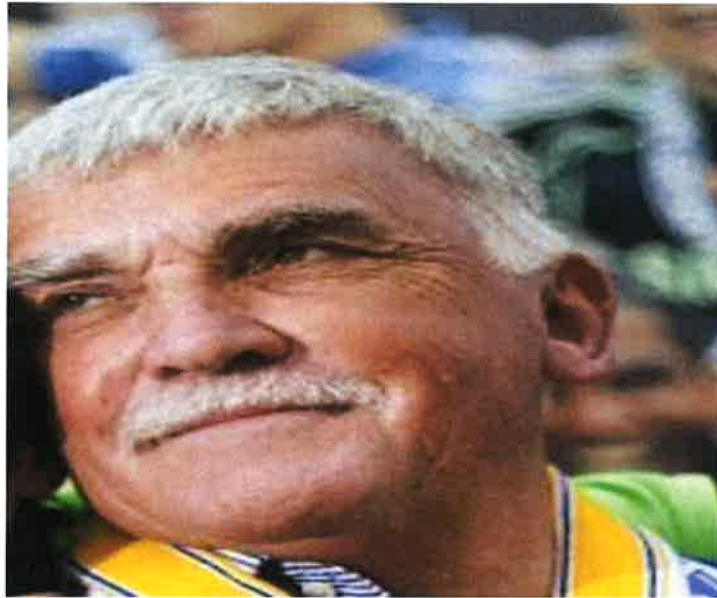
We are also instructed that, in the evening of Saturday 6 March 2020, members of the legal team witnessed an individual who they believed was Mr Stuart Page in the hotel. We understand that the following photograph was taken of Mr Page.

Image of Stuart Page at The One & Only Mirage Palace Hotel – Dubai



On Saturday 7 March 2020, Mr Tsiattalou contacted Quaestio whilst still in Dubai and requested Quaestio to try find a photograph of Mr Page to confirm whether it was indeed him in the hotel.

In response to this request, Quaestio provided the following image⁴ to Mr Tsiattalou and his team. This led to Mr Tsiattalou making a positive identification:



Various images of suspected surveillance operatives who were seen in hotel are shown below: -



⁴ <https://www.thetimes.co.uk/article/blue-is-the-colour-football-is-the-game-m8xwk6cqvp7>



Tracing Operation

Operational Scope

Having been approached by Source A1, Quaestio commenced a tracing operation which ultimately looked to establish who was involved in the chain of command instructing Paul Robinson and whether this could be traced back to a number of people thought to be behind those instructions.

According to Stokoe, given the information that was being presented to them and what they had experienced on the trips to Dubai, it was thought that the most likely people orchestrating these instructions were connected in some way to litigation involving Mr Al Sadeq. In particular, a number of individuals known to be involved in the relevant disputes had connections to Dubai. Mr Page was also known to be the private security and corporate investigation agency retained by the Government of Ras Al Kamiah who are connected to the relevant proceedings.

The strategy adopted by Quaestio was to carry out the following enquiries: -

- Conduct background profiles of all relevant persons and companies of interest and how they were associated.
- Continue to obtain information from Source A1 and be kept informed of any new instructions being sent through from Mr Robinson and track any documents back to those persons instructing Mr Robinson.
- Conduct surveillance on persons of interest when necessary.
- Forensic assessment of potentially compromised digital devices following the possible hotel break-in.

Initial Taskings

Quaestio was advised by Source A1 that, prior to his making contact with Quaestio, there were still live enquiries being conducted on behalf of Paul Robinson. These enquires were in relation to the identification of banking co-ordinates for Radhar Stirling, Mr Farhad Azima and the corporate bank account identification of Hogan Lovells. Quaestio believes that Mr Robinson was informed that those details were not available, although a report on the Hogan Lovells request was being prepared and would be sent by Source A1 in due course.

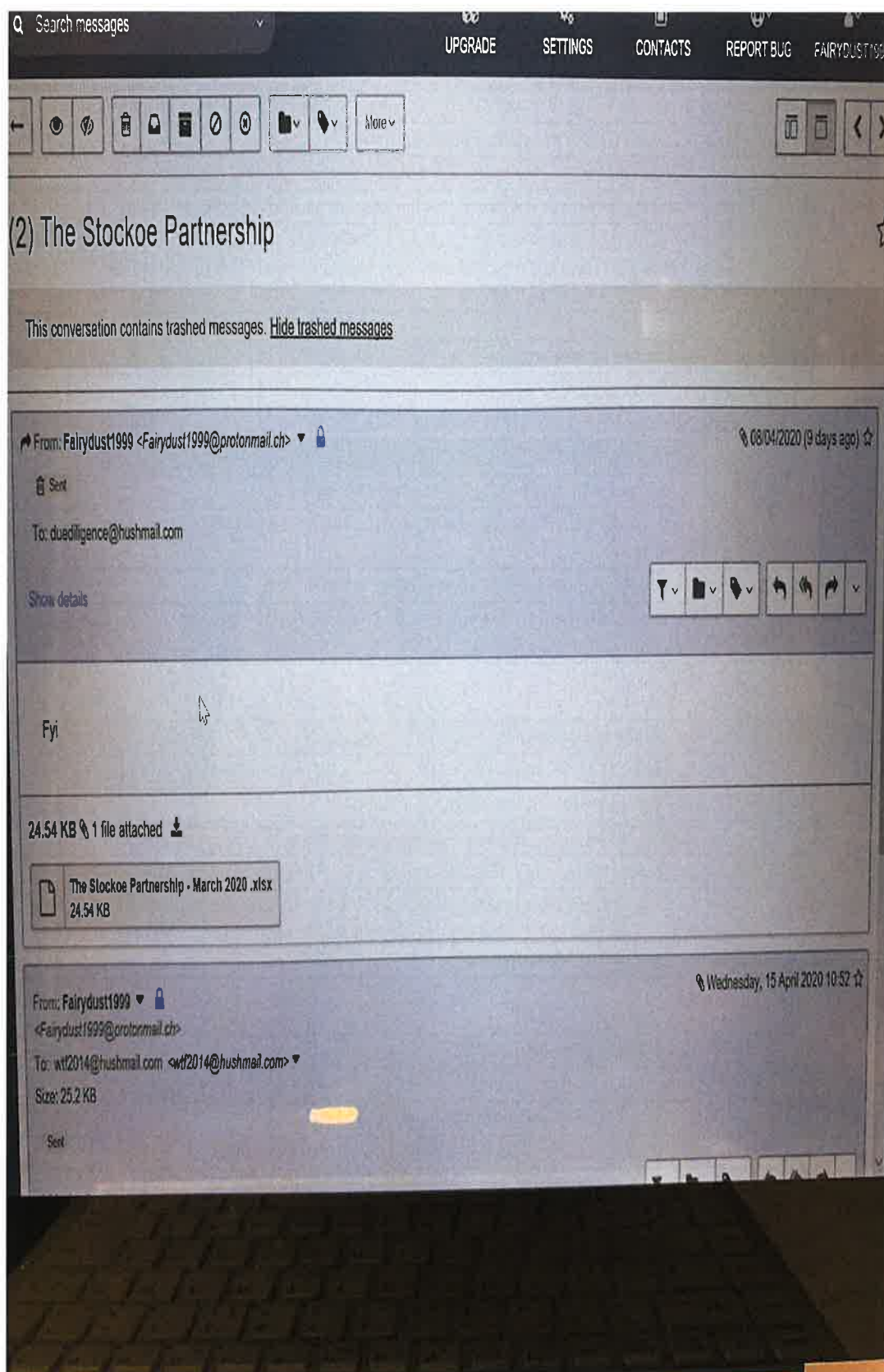
Ongoing Enquiries & Document Tracking

On 2 April 2020, Paul Robinson requested research to be undertaken into identifying the banking co-ordinates of Stokoe.



This request enabled Quaestio to liaise with Stockoe and an agreement was made that if we were able to transcribe the company bank account to a format that would be recognisable to Mr Robinson and his clients, we could then implement a covert tracking facility into this document and look to establish its recipients.

The document was prepared and delivered by Source A1 to Source A2. Source A2 then delivered this document (unbeknown to A2) back to Paul Robinson at the duedilligence@hushmail.com email account.



The following results were obtained:

Target Document Pathway (Stokoe Manch)

Opened on different computer	
Doc Opened	8-Apr-20 at 17:38:58pm (UTC +01:00) - 2hours4mins7secs after sending
Location	London, United Kingdom (86% likelihood)
Opened on	host31-48-65-176.range31-48.bicentralplus.com (31.48.65.176:65261)
Doc Opened	Tracked document opened at 8-Apr-20 at 17:38:58pm (UTC +01:00)
Browser	Used by recipient: Moz/4.0 (MSIE 7.0; WinNT 6.1; Trident/6.0; SLCC2; .NET CLR 2.0.50727; .NET CLR 3.5.30729; .NET CLR 3.0.30729; Media Center PC 6.0; CMDTDF; .NET4.0C; .NET4.0E; tb-mailcom/2.7.4; MSOffice 12)


Re-Opened (by earlier reader #1)	
Opened	8-Apr-20 at 20:13:21pm (UTC +01:00) - 4hours38mins30secs after sending
Location	London, United Kingdom (86% likelihood)
Opened on	Host86-152-6-157.range86-152.bicentralplus.com (86.152.6.157:50268)
Language	Recipient's PC: en-gb (English/United Kingdom)
Doc Opened	Tracked document opened at 8-Apr-20 at 20:13:21pm (UTC +01:00), 8-Apr-20 at 20:15:41pm (UTC +01:00)
Browser	Used by recipient: Moz/4.0 (ms-office; MSOffice 16)
Last log	No more activity after 8-Apr-20 at 20:15:41pm (UTC +01:00) - Log data indicates email was read for at least 2mins20secs (approx.)

Re-Opened (by earlier reader #2)	
Opened	9-Apr-20 at 11:51:46am (UTC +01:00) - 20hours16mins55secs after sending
Location	London, United Kingdom (86% likelihood)
Opened on	Host31-48-65-176.range31-48.bicentralplus.com (31.48.65.176:56080)
Doc Opened	Tracked document opened at 9-Apr-20 at 11:51:47am (UTC +01:00)
Browser	Used by recipient: Moz/4.0 (MSIE 7.0; WinNT 6.1; Trident/6.0; SLCC2; .NET CLR 2.0.50727; .NET CLR 3.5.30729; .NET CLR 3.0.30729; Media Center PC 6.0; CMDTDF; .NET4.0C; .NET4.0E; tb-mailcom/2.7.4; MSOffice 12)

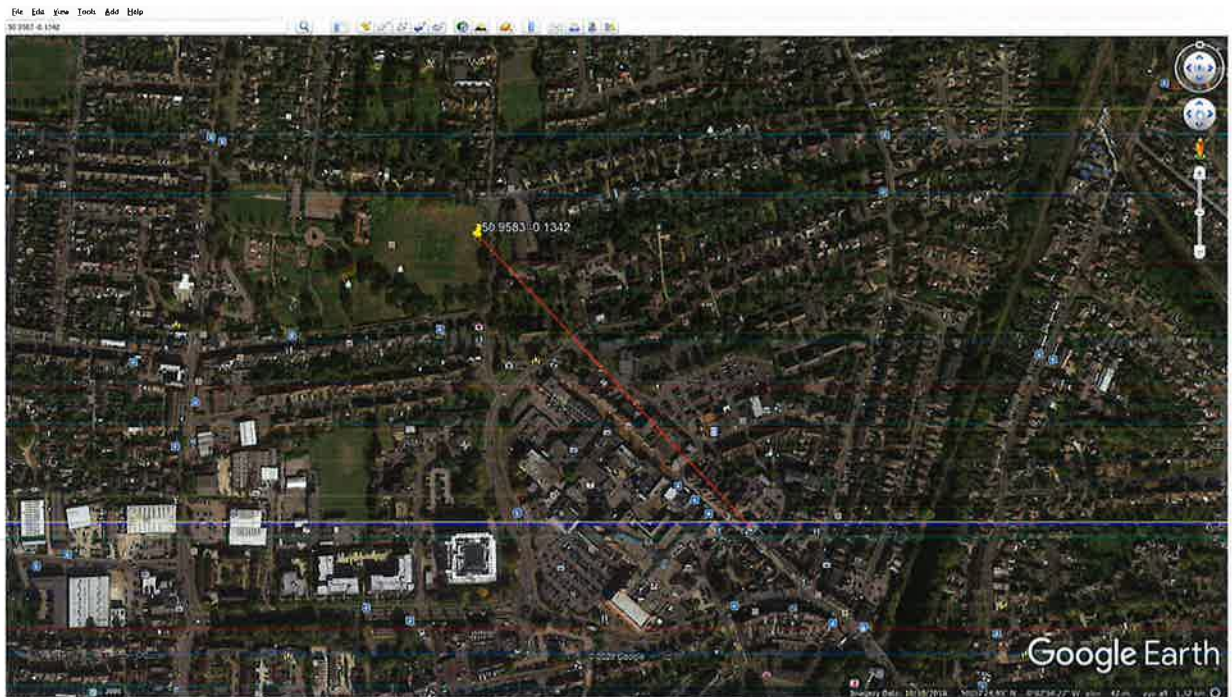
Re-Opened (by earlier reader #2)	
Opened	9-Apr-20 at 12:05:34pm (UTC +01:00) - 20hours30mins43secs after sending
Location	London, United Kingdom (86% likelihood)
Opened on	Host31-48-65-176.range31-48.bicentralplus.com (31.48.65.176:56407)
Doc Opened	Tracked document opened at 9-Apr-20 at 12:05:37pm (UTC +01:00)
Browser	Used by recipient: Moz/4.0 (MSIE 7.0; WinNT 6.1; Trident/6.0; SLCC2; .NET CLR 2.0.50727; .NET CLR 3.5.30729; .NET CLR 3.0.30729; Media Center PC 6.0; CMDTDF; .NET4.0C; .NET4.0E; tb-mailcom/2.7.4; MSOffice 12)

As can be seen from the records above, Quaestio was able to track two readers of the document using two separate IP addresses namely 31.48.65.176 & 86.152.6.157. We can confirm that the IP address 86.152.6.157 is that of Source A2.

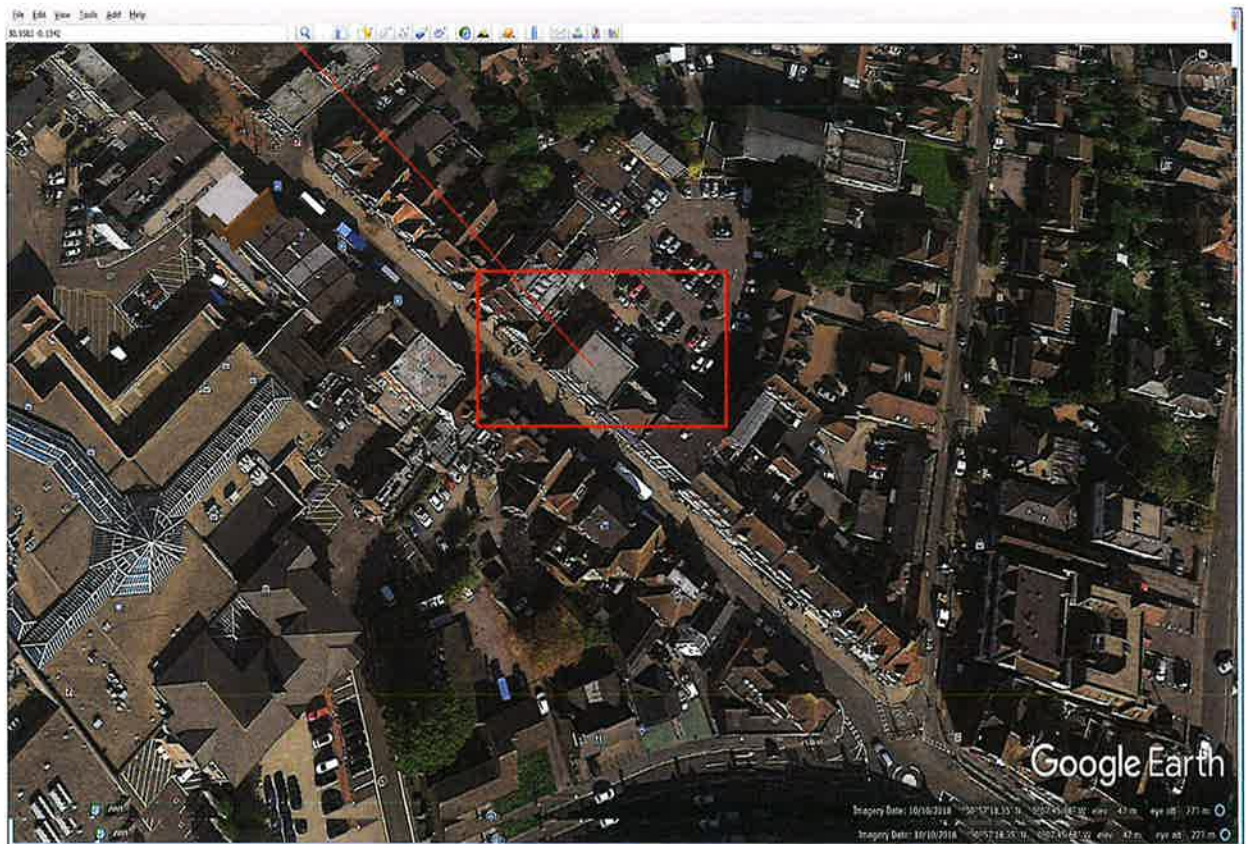
The IP address of 31.48.65.176 has been identified as being associated to the following:

IP Address:	31.48.65.176
Reverse DNS:	176.65.48.31.in-addr.arpa
Hostname:	host31-48-65-176.range31-48.btcentralplus.com
Nameservers:	ns1.bt.net >> 217.32.105.91 ns2.bt.net >> 217.32.105.90 ns0.bt.net >> 217.35.209.188
Location For an IP: 31.48.65.176	
Continent:	Europe (EU)
Country:	United Kingdom  (GB)
Capital:	London
State:	West Sussex
City Location:	Burgess Hill
Postal:	RH15
ISP:	BT
Organization:	BT
AS Number:	AS2856 British Telecommunications PLC
Extra Information for an IP Address: 31.48.65.176	
Continent Lat/Lon:	48.69083 / 9.1405
Country Lat/Lon:	54 / -4.5
City Lat/Lon:	(50.9583) / (-0.1342)
IP Language:	English, Irish, Ulster Scots, Scottish Gaelic, Scots, Welsh, Cornish

Searches were then carried out in relation to the geo location of the IP address and where the document had been opened. In respect of the IP Address 31.48.65.176, Quaestio identified the location shown by the yellow pinpoint in the image below:



According to our research, the document was opened by the same recipient in the location of Burgess Hill RH15. This location was in remarkably close proximity, some 482 metres away, from 28a Church Road Burgess Hill RH15 9AE, which is the office address occupied and used by Mr Robinson and his company “Company Documents Ltd”.






The document can then be seen to have been opened on two further occasions on 9 April 2020 with the following results returned:

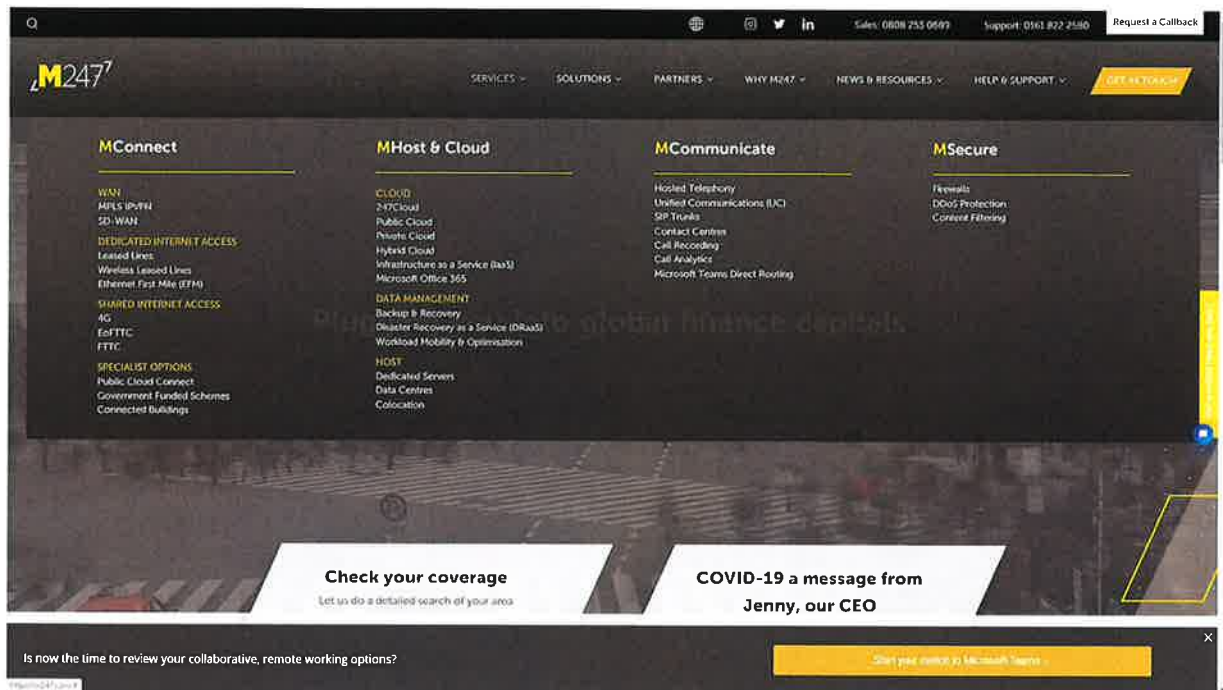
Forwarded/opened on different computer	
Opened	9-Apr-20 at 13:06:37pm (UTC +01:00) - 21hours31mins46secs after sending
Location	Manchester, United Kingdom (86% likelihood)
Opened on	81.92.206.4:50345
Doc Opened	Tracked document opened at 9-Apr-20 at 13:06:37pm (UTC +01:00), 9-Apr-20 at 13:12:07pm (UTC +01:00)
Browser	Used by recipient: LibreOffice
Last log	No more activity after 9-Apr-20 at 13:12:07pm (UTC +01:00) - Log data indicates email was read for at least 5mins30secs (approx.)

Re-Opened (by earlier reader #3)	
Doc Opened	9-Apr-20 at 13:22:46pm (UTC +01:00) - 21hours47mins55secs after sending
Location	Manchester, United Kingdom (86% likelihood)
Opened on	81.92.206.4:58149) Provider: M247 LTD Manchester Infrastructure (m247.com)
Doc Opened	Tracked document opened at 9-Apr-20 at 13:22:46pm (UTC +01:00)
Browser	Used by recipient: LibreOffice

The IP address of 81.92.206.4 can be identified as being associated to the following: -

IP Address:	81.92.206.4
Reverse DNS:	** server can't find 4.206.92.81.in-addr.arpa: SERVFAIL
Hostname:	81.92.206.4
Location For an IP: 81.92.206.4	
Continent:	Europe (EU)
Country:	United Kingdom  (GB)
Capital:	London
State:	London, City of
City Location:	London
Postal:	EC2P
ISP:	Venus Business Communications Limited
Organization:	Venus Business Communications Limited
AS Number:	AS9009 M247 Ltd
Extra Information for an IP Address: 81.92.206.4	
Continent Lat/Lon:	48.69083 / 9.1405
Country Lat/Lon:	54 / -4.5
City Lat/Lon:	(51.5088) / (-0.126)

This IP address appears to be used by a business to business hosting company M247 Ltd.



The IP address geo location is that of the following address: 2 Adelaide Street Charing Cross London WC2N 4HZ.



At this stage of the enquiry we have not been able to confirm who were the recipients that opened this document (Stokoe Manch). We observe, however, that the IP address geo location is in close proximity, circa 800 metres, to the address of the UK office of Page Corporate Investigations 5-8 The Sanctuary Westminster London SW1P 3JS. This company is believed to be associated with Mr Stuart Page.

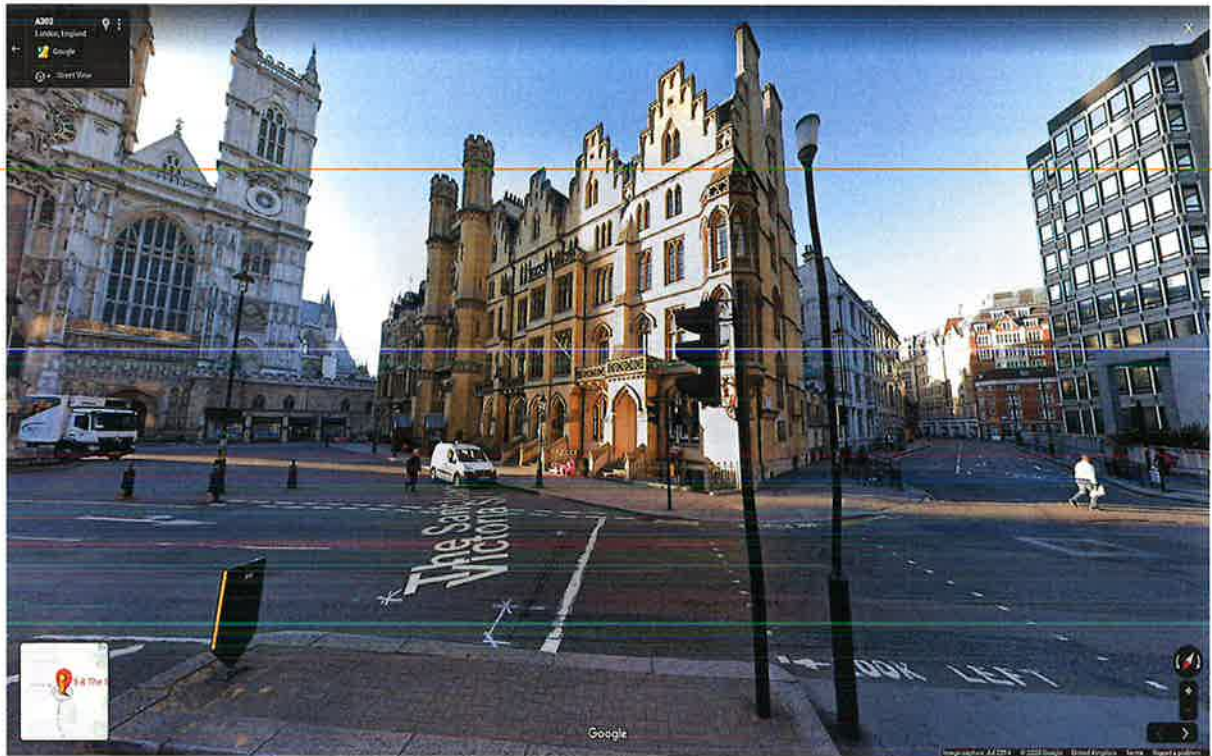
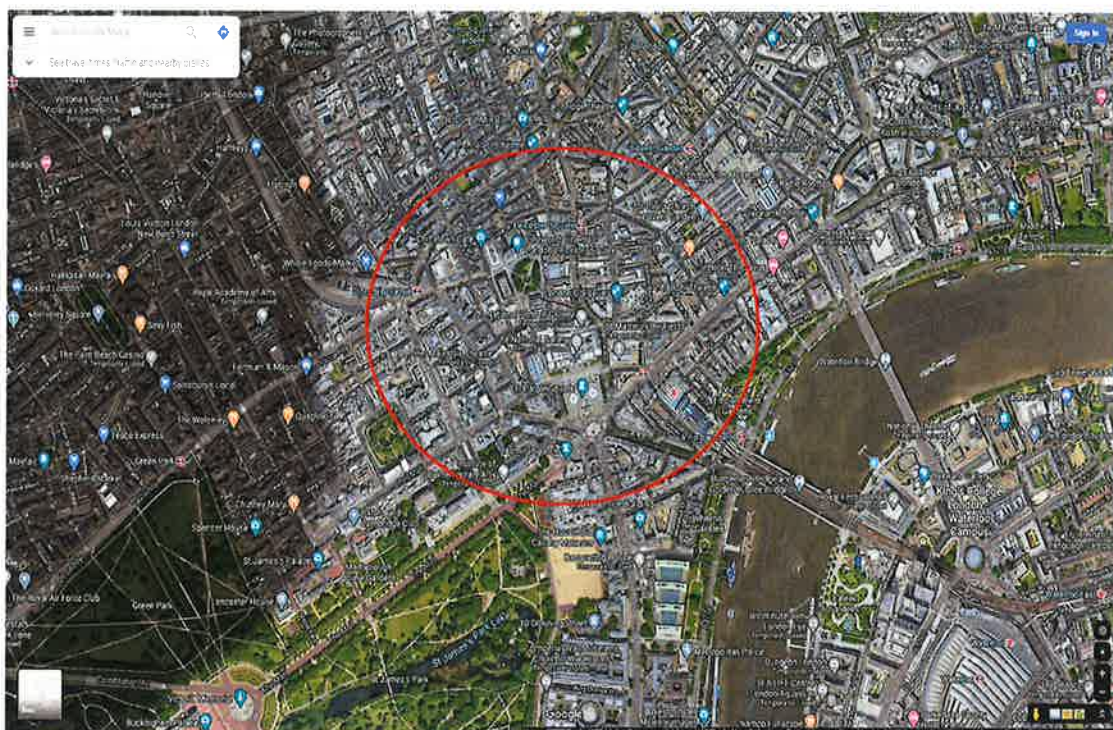


Image of distance between Adelaide Street & Page Office Location.



The document, geo located to Adelaide Street, is also in the vicinity to a number of other known corporate intelligence agencies.



Summary Stokoe (Manch) - as at 9-Apr-20 at 17:35:05pm (UTC +01:00) - 1day 2hours 14secs after sending	
Total	Opened 7 times by 3 readers
Reader #1	Opened 2 times for 2mins20secs total
Reader #2	Opened 3 times
Reader #3	Opened 2 times for 5mins30secs total

On 9 April 2020, Paul Robinson requested that the main Stokoe trading bank account be accessed and requested transactional data for the business bank account for the last three months history.

Surveillance April 2020

Via discrete enquiries made by Source A1 on 14 April 2020, it was established that Source A2 would be meeting with Paul Robinson within the next 24/48 hrs and that the meeting location would be the car park of Waitrose in Petersfield. Source A2 was to be furnished with a cash payment from Paul Robinson regarding the work being carried out on his behalf.

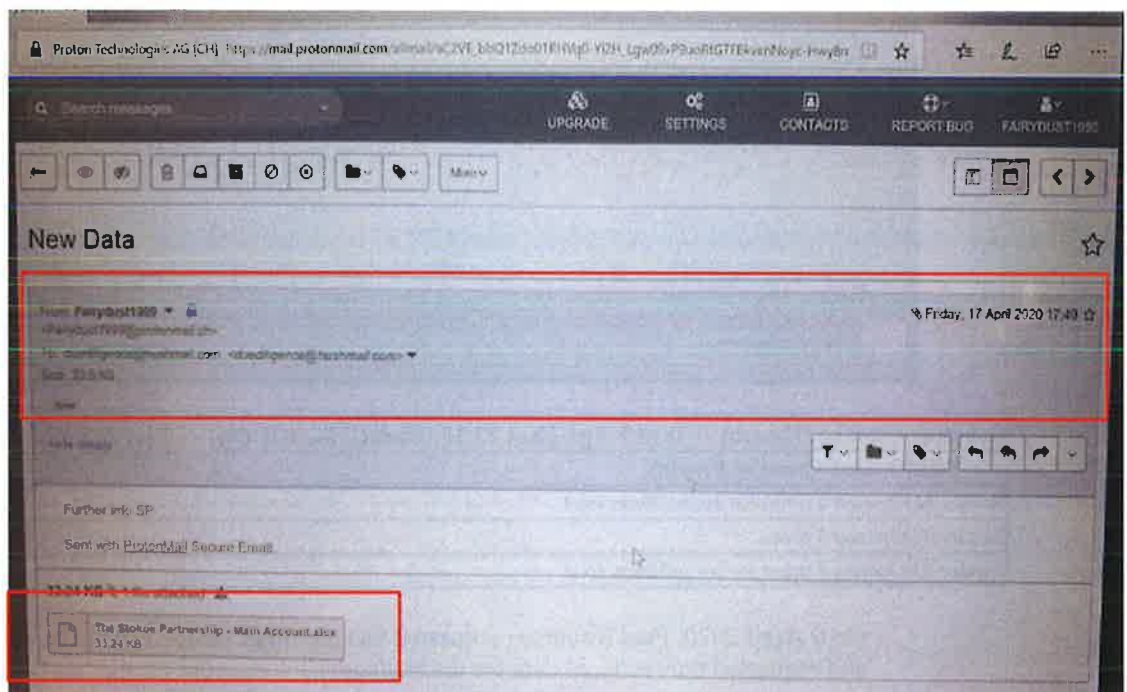
Considering this information carefully, Quaestio deployed a three-man surveillance team at short notice, to monitor the activities of Paul Robinson.

Intelligence received from Source A1 over the subsequent days identified A2 had in fact informed Source A1 that the meeting location had changed, for unbeknown reasons to A1, and that in fact the meeting was to take place in an unknown location in Southampton, given that Paul Robinson was in the location of Gosport and it would be more convenient. Quaestio later learned that the meeting between Paul Robinson and Source A2 did take place on 20 April 2020.

Unfortunately, due to the short notice of the intelligence surrounding the meeting location on 20th April 2020, surveillance operatives were unable to observe this meeting.

On 15 and 17 April 2020, Quaestio took instructions from Stokoe regarding the request made by Paul Robinson on 9 April 2020 regarding access to the transactional data of Stokoe's main trading account. Quaestio then re-deployed the tracing exercise and transcribed additional banking information from Stokoe's London office account so that it looked in line with what Mr Robinson would have been expecting. The document was transcribed in such a way to protect certain confidential information relating to Stokoe's clients, employees, service providers and the people and companies involved in the current set proceedings.

This document was prepared, executed and launched and A2 delivered this document (unknown to Source A2) back to Mr Robinson at the duedilligence@hushmail.com email account.

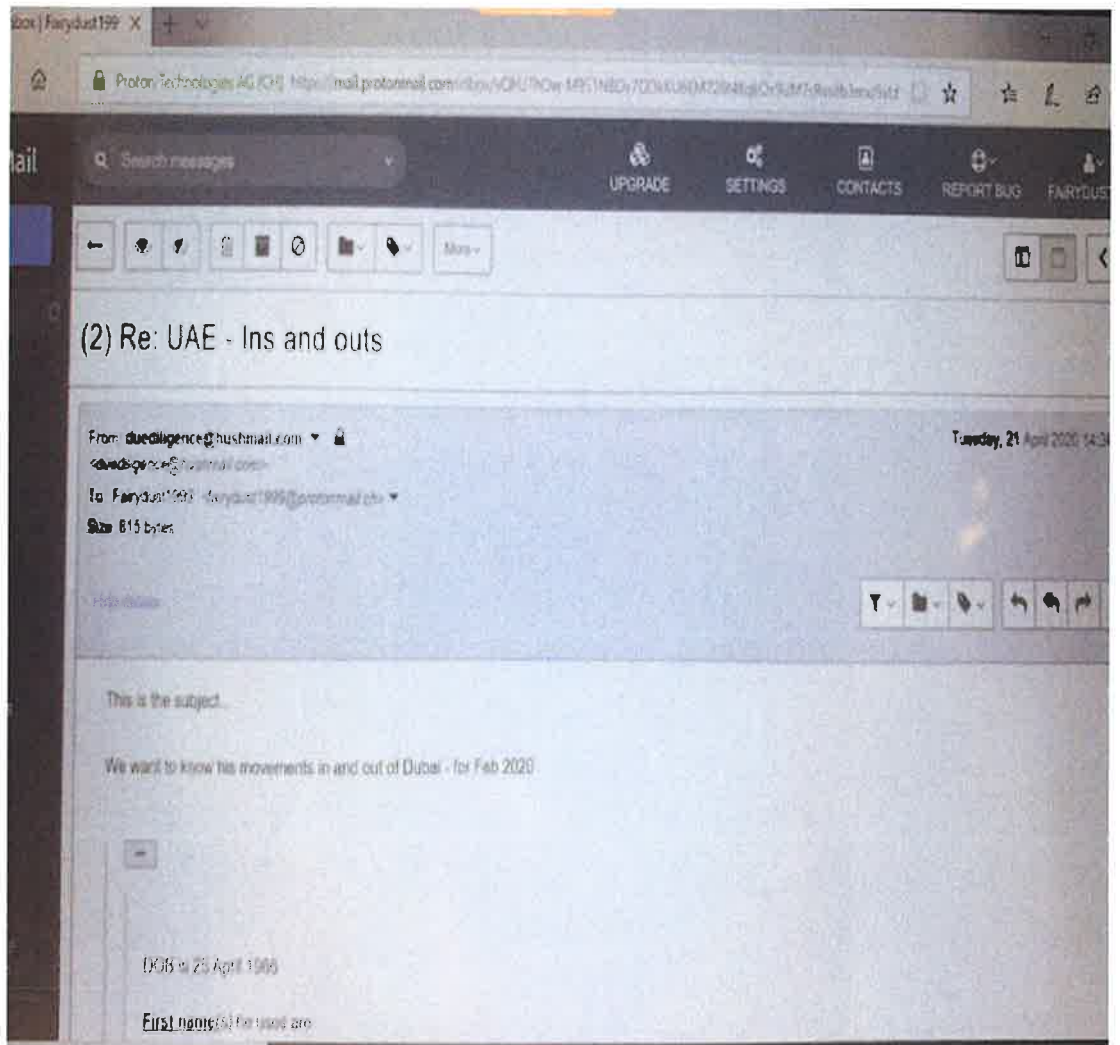


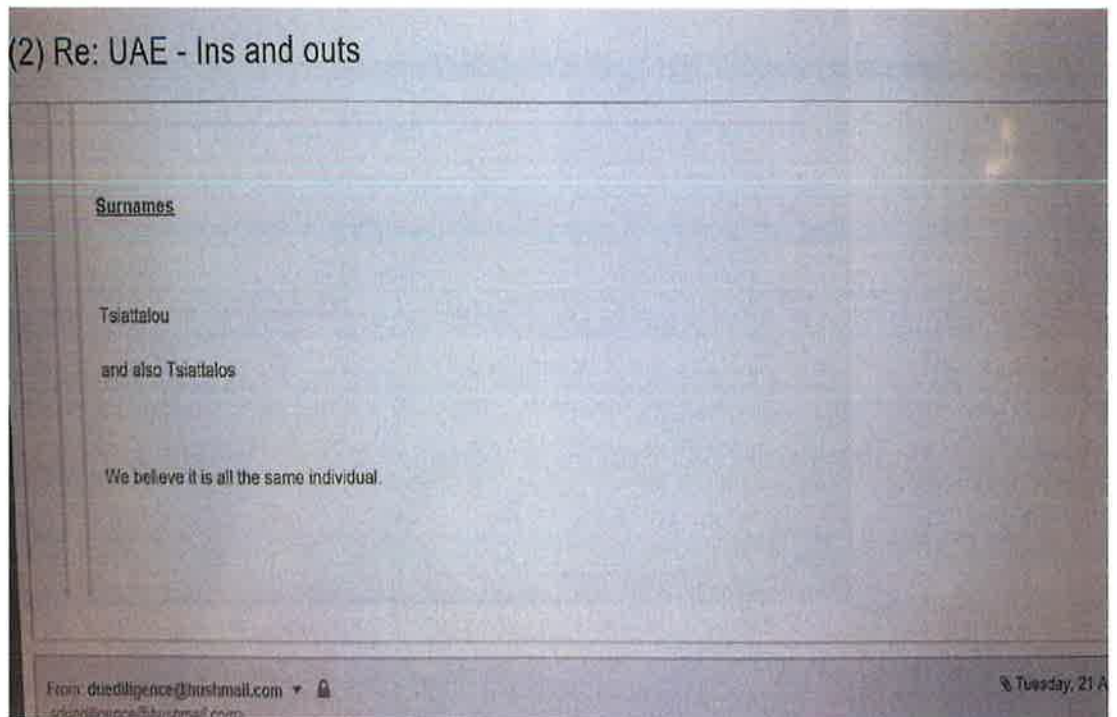
On these occasions however, the document appears not to have registered at any location during the tracing exercise. Quaestio does not know the reason for this, but one likely possibility is that the document was never opened on a device that was live and connected to the internet. Given that the document was launched at around the time that Source A2 understood Paul Robinson was liaising with his client(s), it is entirely possible that he printed these documents off and personally handed them over.

What can be said, however, is that we have demonstrated that these documents were delivered to the same email account controlled by Paul Robinson and, as can be shown later in this report, very specific requests were then made in conjunction with receiving these documents.

On 21 April 2020 Paul Robinson requested that research be conducted in relation to Mr Tsiattalou of Stokoe and specifically his travel movements in and out of Dubai for the month of February 2020.

Screen shots of these requests are shown below. Source A1 understands that Source A2 was unable to source this information from a contact in Dubai until at least late May or early June 2020. Quaestio understands that Mr Tsiattalou reported these requests for further information to the relevant authorities.





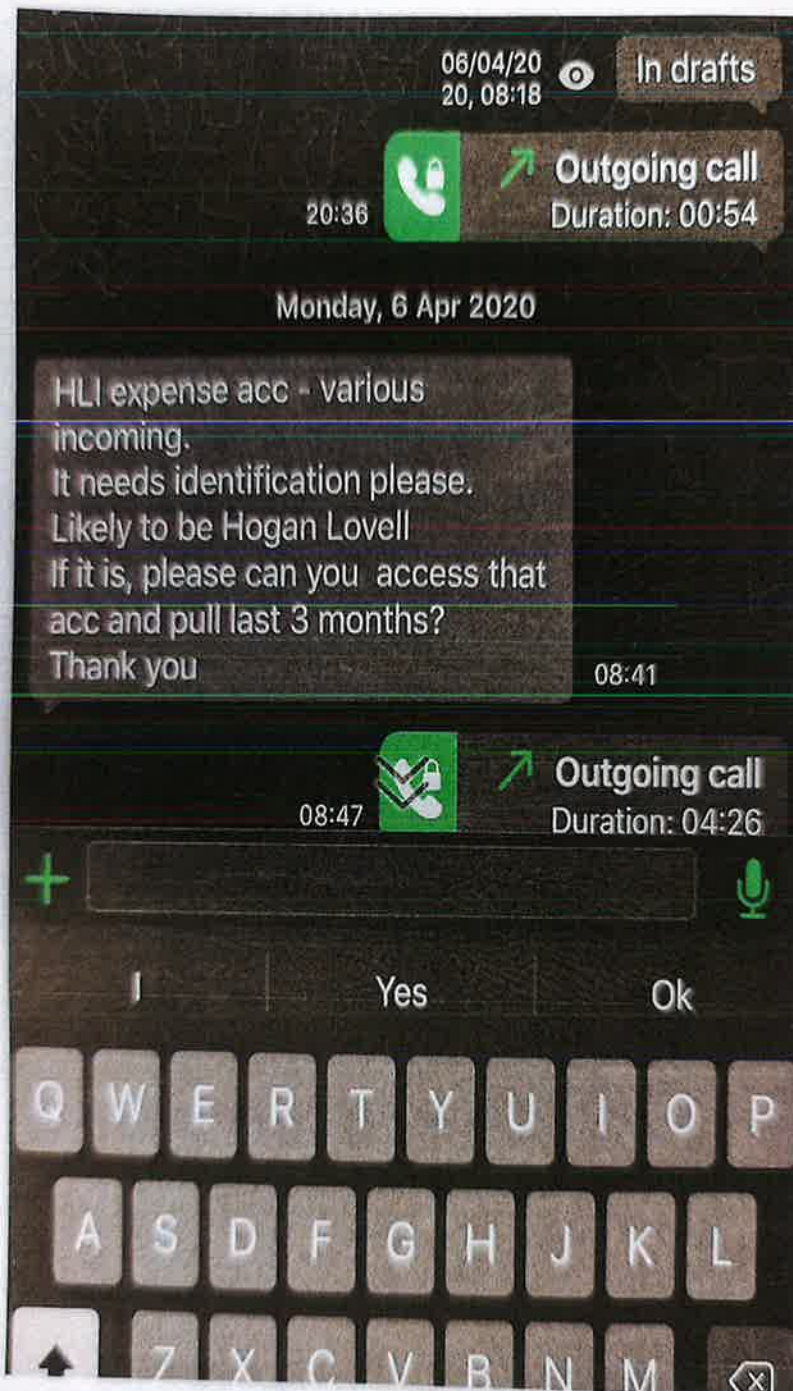
On 22 April 2020 Paul Robinson requested, via Threema, that he was now seeking information on the client account - or more specially the feeder account - to the main Stokoe trading account given that the information he was seeking was not detailed in the material he had seen following the transmission of the 15 and 17 April 2020 banking information which had been transcribed by Quaestio. These instructions were then relayed by Source A2.

In this request Mr Robinson instructed the acquisition of transactional information for the month of March 2020 and, subject to those findings, he was intending to request the period November 2019 to February 2020.

Given that Source A1 was now working with Quaestio, it was reported to Paul Robinson via Source A2 that this information was not achievable given that Stokoe now had heightened security.

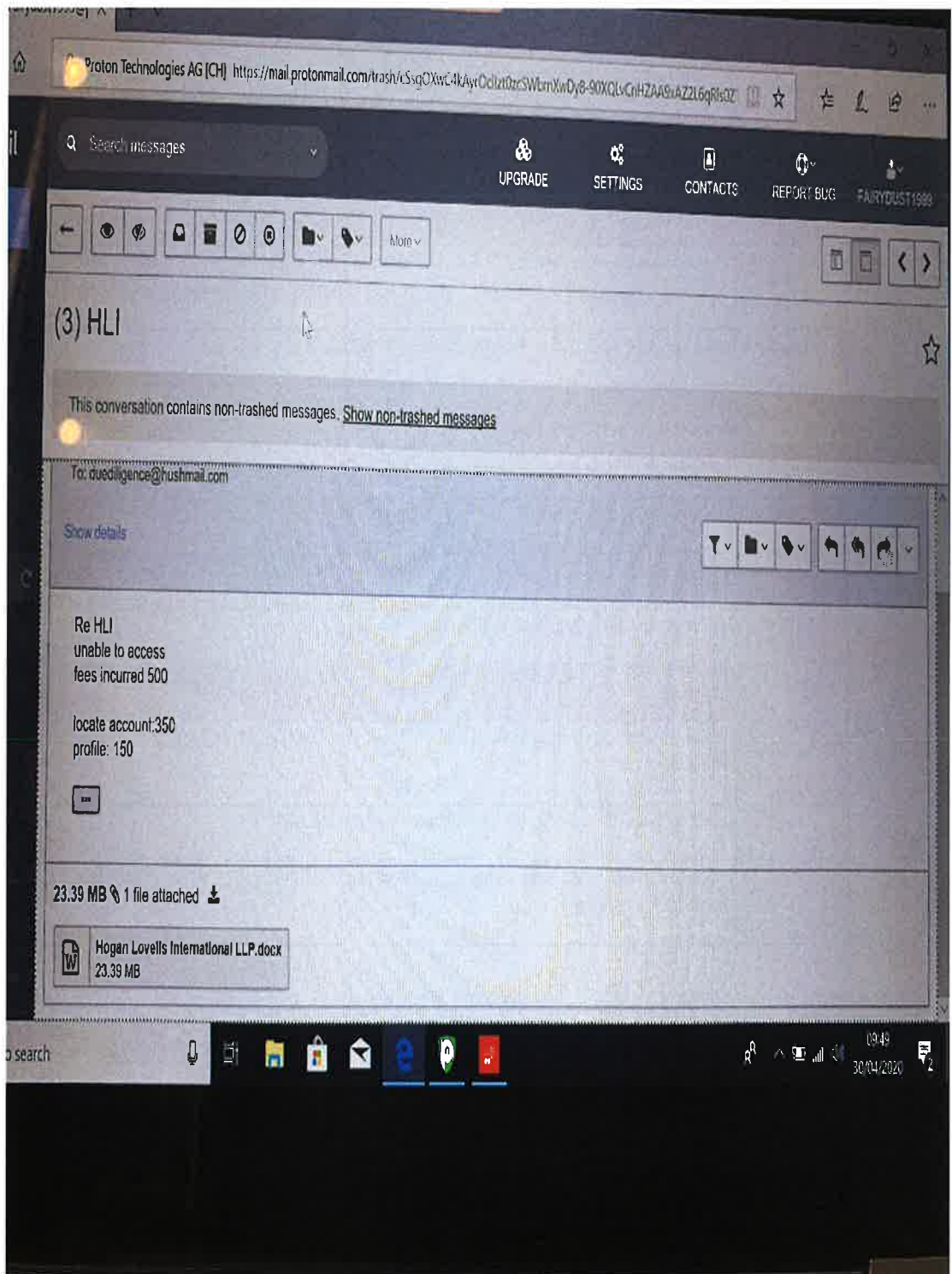
On 11 March 2020 and 6 April 2020 the following requests were received by Source A1:





Source A1 compiled a report containing incorrect information and outlining why this information was not possible to obtain. It did however provide Quaestio with another opportunity to track this material.

The document was prepared and delivered by Source A1 to Source A2. Source A2 then delivered this document (unknown to Source A2) back to Paul Robinson at the duedillgence@hushmail.com email account.



The following results were obtained: -

Target Document Pathway (Hogan Lovells International LLP)


Subject	Hogan Lovells International LLP	
Sent on	23-Apr-20 at 17:50:01pm 'Europe/London' time	
1st Open	23-Apr-20 at 17:51:17pm +01:00	(86%) Test location, United Kingdom

Doc Opened	24-Apr-20 at 17:40:43pm (UTC +01:00) - 23hours50mins42secs after sending	
Location	London, United Kingdom (86% likelihood)	
Opened on	host5-81-45-198.range5-81.btccentralplus.com (5.81.45.198:52751)	
Doc Opened	Tracked document opened at 24-Apr-20 at 17:40:43pm (UTC +01:00), 24-Apr-20 at 17:41:57pm (UTC +01:00), 24-Apr-20 at 17:48:37pm (UTC +01:00), 24-Apr-20 at 17:53:28pm (UTC +01:00)	
Browser	used by recipient: Moz/4.0 (ms-office; MSOffice 16)	
Last log	No more activity after 24-Apr-20 at 17:53:28pm (UTC +01:00) - Log data indicates email was open for at least 12mins45secs (approx.)	

Re-Opened (by earlier reader #1)		
Doc Opened	24-Apr-20 at 18:07:18pm (UTC +01:00) - 1day17mins17secs after sending	
Location	London, United Kingdom (86% likelihood)	
Opened on	host5-81-45-198.range5-81.btccentralplus.com (5.81.45.198:53111)	
Doc Opened	Tracked document opened at 24-Apr-20 at 18:07:18pm (UTC +01:00), 24-Apr-20 at 18:09:18pm (UTC +01:00)	
Browser	used by recipient: Moz/4.0 (ms-office; MSOffice 16)	
Last log	No more activity after 24-Apr-20 at 18:09:18pm (UTC +01:00) - Log data indicates email was read for at least 2mins (approx.)	

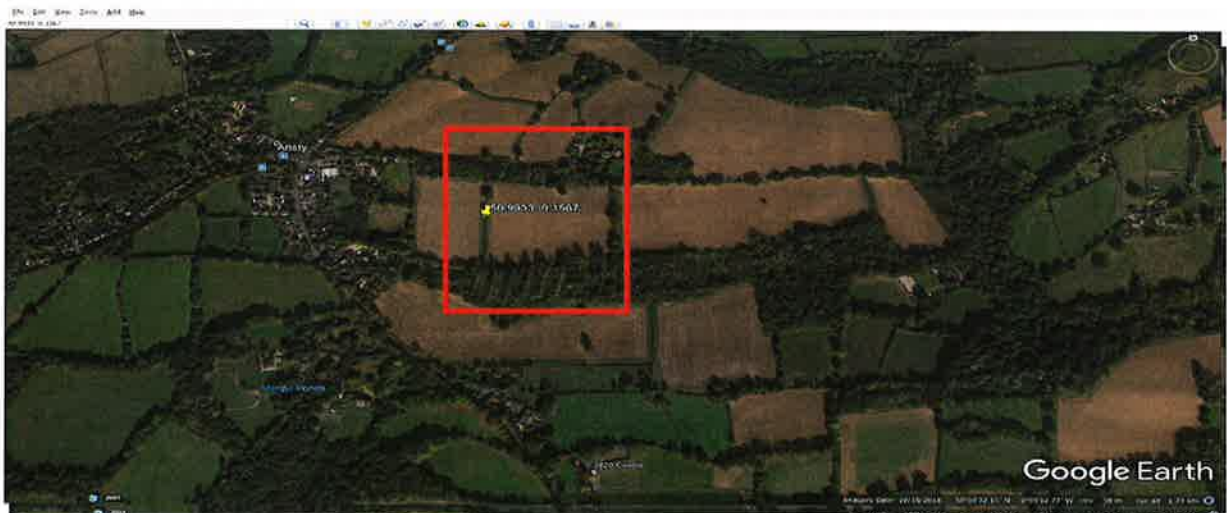
As can be seen from the two records above there was one known reader of the document which Quaestio has tracked which has identified, with one IP address namely 5.81.45.198.

The IP address of 5.81.45.198 can be identified as being associated to the following: -

IP Address:	5.81.45.198
Reverse DNS:	198.45.81.5.in-addr.arpa
Hostname:	host5-81-45-198.range5-81.btcentralplus.com
Nameservers:	ns0.bt.net >> 217.35.209.188 ns2.bt.net >> 217.32.105.90 ns1.bt.net >> 217.32.105.91
Location For an IP: 5.81.45.198	
Continent:	Europe (EU)
Country:	United Kingdom  (GB)
Capital:	London
State:	West Sussex
City Location:	Haywards Heath
Postal:	RH17
ISP:	BT
AS Number:	AS2856 British Telecommunications PLC
Extra Information for an IP Address: 5.81.45.198	
Continent Lat/Lon:	48.69083 / 9.1405
Country Lat/Lon:	54 / -4.5
City Lat/Lon:	(50.9933) / (-0.1567)

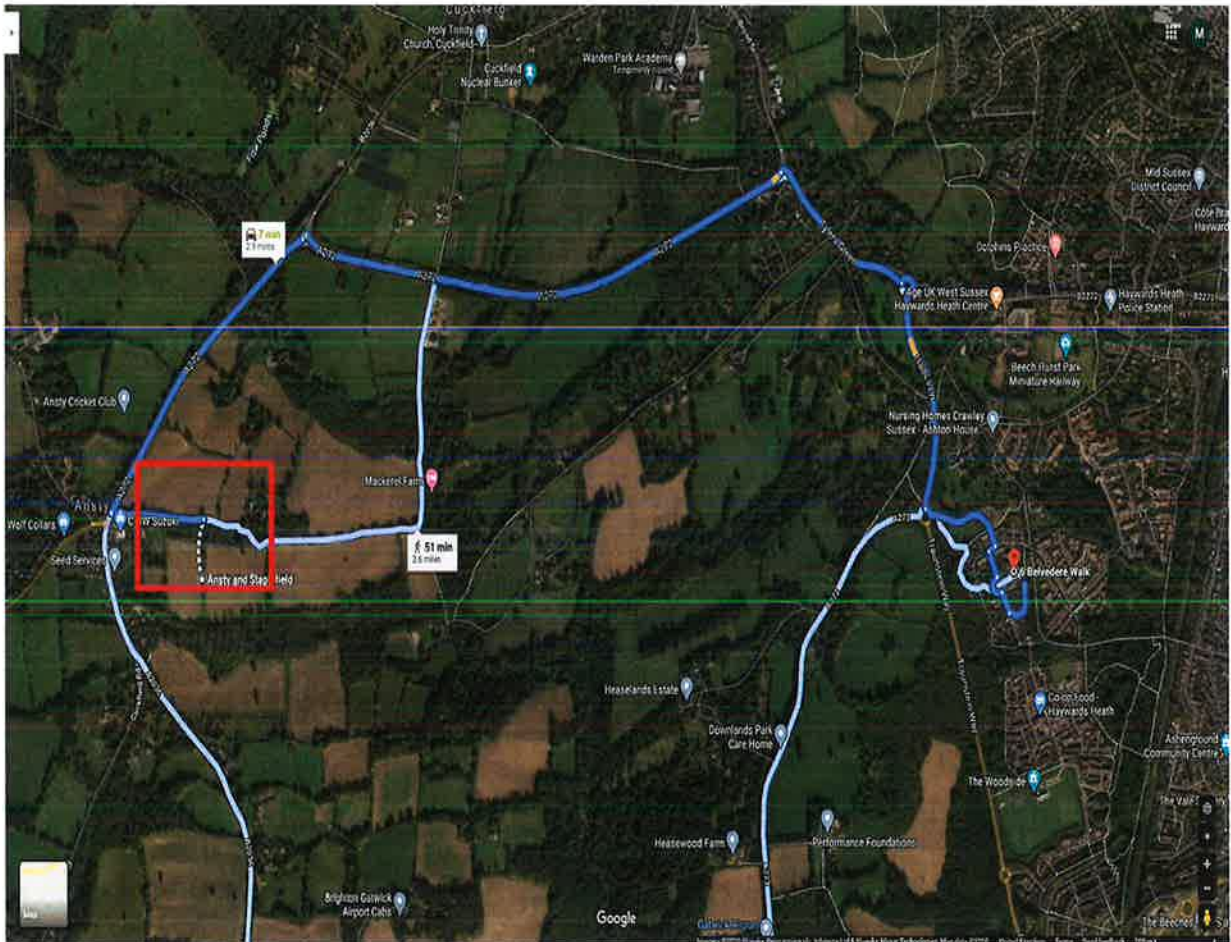
The IP address geo location is that of the following address: -

Ansty, Haywards Heath RH17.



Upon further research it can be seen that this location is approximately 1500 meters from the home address of Paul Robinson whose residential address is located at 6 Belvedere Walk Haywards Heath RH16 4TD.

Image of distance between document tracker record and home address of Paul Robinson.



Summary - as at 27-Apr-20 at 16:30:07pm (UTC +01:00) - 3days22hours40mins6secs after sending	
Total	Opened 4 times by 2 readers
Reader #1	Opened 3 times for 14mins45secs total
Reader #2	Opened 1 time for 28secs total (Document Test)

On 23 April 2020, Mr Robinson made enquiries of Source A2 via Threema as to the entry in the Stokoe main trading bank account. He enquired as to the payments referenced "SFB". According to Mr Tsiattalou, this entry relates to one of Mr Tsiattalou's other companies, Speciality Flat Breads Ltd. Mr Robinson asked whether these entries had been amended or shortened. Quaestio understands that it was explained to Mr Robinson by Source A2 that he had only provided what had been given to him and could not comment further. In Quaestio's assessment, this suggests that Mr Robinson and possibly those instructing him have read the Stokoe Main Trading bank account as transcribed by Quaestio.

Reported Phishing Attempts

Quaestio has also been instructed that, since the litigation involving Mr Al Sadeq first became publicly known, a number of individuals and companies acting in that litigation have received an unusual number of targeted phishing attempts to access their personal data.

Quaestio has not carried out an extensive analysis of these attempts. We are, however, able to comment that the heightened activity and level of sophistication of these phishing attempts is understandably concerning. Quaestio is also aware that allegations of phishing have also been raised in a related set of legal proceedings involving Mr Farhad Azima, who is one of the targeted individuals referred to above in this report.

A short summary of some of these malicious communications is set out below.

Stokoe Partnership Solicitors

Quaestio understands that Mr Tsiattalou has received numerous emails with varying links contained within them all of which appear not to originate from known or genuine sources. At this early stage of Quaestio's analysis, it would appear clear to us that these are ultimately phishing and spear phishing attempts to access data or confidential information.

Quaestio has been informed that, as recently as 16 June 2020, Mr Tsiattalou has reported receiving an SMS message on his mobile phone timed at 15.32 hrs with what appears to be a phishing message enticing him to click on a suspicious link. What is of additional interest here is that Mr Tim Maltin and Arthur Maltin, representatives of Maltin PR who are also mentioned above in this report, have also received exactly the same SMS message with exactly the same link at 15.31 hrs on the same day, only one minute before Mr Tsiattalou.

In addition to the above, on the 16th March 2020, Nicholas Wright of 4 Stone Buildings and Maria Theodoulou of Stokoe received suspicious phone calls from phone numbers they did not recognise. Opensource tracing exercises revealed that the number that called Mr Wright (which was not answered) could be traced back to Ras Al Khaimah. Ms Theodoulou answered the she received and then heard a ringing tone as if she was in fact the person making the phone call.

Given Mr Tsiattalou's overall concerns about potential malicious actors in this case, he has personally liaised with his outsourced IT specialists company who have been monitoring closely the activity on the Stokoe servers. What can be said from this exercise is that there has been a surprising increase in suspect activity on the servers over the April 2020 bank holiday.

Other targets

Quaestio has also received reports from other members of the legal team and other professionals connected with Mr Al Sadeq's High Court proceedings that they, too, have suffered sophisticated phishing attempts including purported LinkedIn private messages with suspect links

We do not comment further on these matters at this stage.

STATEMENT OF TRUTH

I, Alexander Sawyer, of Quaestio Intelligence Services Ltd, confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those which are within my knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer. I understand my duty to the Court and have complied with that duty and I am aware of the requirements of Part 35, the Practice Direction and the Protocol for Instruction of Experts to give Evidence in Civil Claims.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

SIGNED:



ALEXANDER SAWYER

DATED: 27th June 2020

ANNEXES

From: Fairydust1999 <Fairydust1999@protonmail.ch>

To: duedlligence@hushmail.com

Show details

Fyi

This conversation contains non-trashed messages. [Show non-trashed messages](#)

From: Fairydust1999 <Fairydust1999@protonmail.ch>

To: rhapsody7@protonmail.ch <rhapsody7@protonmail.ch>

Size: 1.1 KB

Sent

[Hide details](#)

Sent with [ProtonMail](#) Secure Email.

----- Original Message -----

On Wednesday, 1 April 2020 14:55, Fairydust1999 <Fairydust1999@protonmail.ch> wrote:

Martin - Quote re FA

77
search



Mr Paul Antony Robinson – Company Documents Limited



Mr Paul Antony Robinson

Mr Paul Antony Robinson was born on the 16th April 1972.

We have identified his email address as: info@companydocuments.com

We have **successfully traced them both** to currently reside at:

6 Belvedere Walk, Haywards Heath, West Sussex, RH16 4TD – Since October 2017



Mr Robinson is the **Managing Director** of **Company Documents Limited**.

We comment upon this limited concern as follows:

Company Documents Limited

This **private limited company** which bears the **registered number 04578591** was incorporated in the England & Wales on the **31st October 2002**.

The company's **registered office address** is provided as: **66 Prescott Street, London, E1 8NN**.

The company lists its **trading address** as: **Kinsfield House, 66 Prescott Street, London, E1 8NN**.

It is registered for VAT under **VAT number: GB936721411**.

The company has a website: www.companydocuments.com

The nature of the company's business is recorded as:

SIC 63990 – Other Information Service Activities N.E.C

SIC 7487 – Other Business Activities

Its **principal activity** is listed as **Corporate Research**.

At incorporation the company has an **authorised share capital** of **£400.00** divided in to **400 shares** of **£1 each**. These were allotted as follows:

Paul Antony Robinson	200 Ordinary Shares	50% Share Count
Michelle Jenkins	100 Ordinary Shares	25% Share Count
Christine Robinson	100 Ordinary Shares	25 % Share Count

On the **1st November 2002** the following individuals were **appointed officers** of the company:

Company Director	Mr Barry Graham Robinson, Born January 1941. He recorded his address as 28a Church Road, Burgess Hill, West Sussex, RH15 9AE. He listed his business occupation as: Consultant.
Company Director	Mr Paul Antony Robinson, Born April 1972. He recorded his address as 28a Church Road, Burgess Hill, West Sussex, RH15 9AE. He listed his business occupation as Consultant.
Company Secretary	Mr Barry Graham Robinson, Born January 1941. He recorded his address as 28a Church Road, Burgess Hill, West Sussex, RH15 9AE. He listed his business occupation as: Consultant.

On the **25th June 2013** the following individual was also **appointed as an officer** of the company:

Company Director	Mrs Michelle Emma Jenkins, Born June 1983. She recorded her address as 28a Church Road, Burgess Hill, West Sussex, RH15 9AE. She listed her business occupation as: Researcher.
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Due to the company's size, it is only required to file **abbreviated accounts**. It last filed accounts for the **year ended 31.03.2019** and which showed it had recorded **shareholders funds of £67,791** compared to the **previous year of £33,009**.

The company has **no mortgages or charges** registered against it.

It also has **no detrimental information** recorded in relation **County Court Judgements** etc.

We now deal with the addresses listed for the company:

Kinsfield House, 66 Prescott Street, London, E1 8NN

This is the trading address of **Carter Backer Winter LLP** who are **accountants, Tax and business advisors**.

28a Church Road, Burgess Hill, West Sussex, RH15 9AE

This is the trading address of **Laurence Gould Partnership Ltd**. They are **business consultants** who assist companies in all manner of business development.

Corporate website: www.companydocuments.com

A screen shot taken:



This provides the following contact details:

Company Documents Ltd
5 Chancery Lane
London
WC2A 1LG
United Kingdom
Tel- **+44 (0)20 7383 4477**
Fax- **+44 (0)20 7383 4488**
info@companydocuments.com

We now deal with the identified contact details:

The address: 5 Chancery Lane, London, WC2A 1LG are serviced offices provided by www.offices.org.uk.

Directorship searches" under his name which has revealed the following additional information:

Risk Awareness Limited

This private limited company which bears the registered number: 05198734 was incorporated in England and Wales on the 5th August 2004.

The company's Registered Office address and trading address is the same and provided as: Cepea, St Georges Lane, Hurstpierpoint, Hassocks, BN6 9QX.

The nature of the company's business is provided as:

SIC Code	63990	Other Information Services Activities N.E.C
SIC Code	7487	Other Business Activities

It principal business activity is listed as the provision of training services.

The company has an authorised share capital of £1000 divided in to 1000 ordinary shares of £1 each. These have been allotted as follows:

Barry Graham Robinson	500 Ordinary Shares	50% Share Count
Paul Antony Robinson	500 Ordinary Shares	50% Share Count

On the 5th August 2004, the following individuals were appointed as officers of the company:

Company Director/Secretary Mr Barry Graham Robinson, Born January 1941, Cepea, St Georges Lane, Hurstpierpoint, Hassocks, West Sussex, BN6 9QX. He provided his business occupation as Consultant.

Company Director Mr Paul Antony Robinson, Born April 1972.

However he resigned on the 11th September 2004.

Other previous recorded officers:

Company Director Mr John Watts, Born September 1943.

He was appointed as a Director on the 5th August 2004 and he resigned on the 5th July 2007.

Company Director Mr James John Oakes, Born August 1957

He was appointed as a Director on the 14th September 2004 and he resigned on the 4th July 2007.

Company Director Christine Robinson, Born June 1945.

She was appointed as a Director 5th July 2007 and she resigned on the 1st July 2010.

For further information, please refer to the company report.

